

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

DATE: JULY 6, 2020 PREPARED BY: (b) (6), (b) (7)(C)

CASE #: OI-AT-2020-ADM-0018 CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ES-00, (b) (6), (b) (7)(C)

CASE CLOSING REPORT

| Subject(s) | Location | Other Data |
|---------------------|---------------------|---------------------|
| (b) (6), (b) (7)(C) | (b) (6), (b) (7)(C) | ES-00 |
| | | (b) (6), (b) (7)(C) |
| | | |

VIOLATION(S):

5 C.F.R. § 2635.101(b) (8) & (b) (14) - Basic Obligation of Public Service

ALLEGATION:

(b) (6), (b) (7)(C) directed, influenced or attempted to influence contract awards benefiting Black & Veatch, an EPA Region 4 contractor.

FINDINGS:

During the course of this investigation, OIG-OI interviewed

Divisions. Statements obtained during

these interviews revealed:

Generally, Superfund activities fell within one of three types: emergency response, removal, and remediation. Emergency response and Removal actions were managed by On-Scene Coordinators (OSC) and remedial actions was managed by Remedial Project Managers (RPM). Different contract award mechanisms were utilized for activities associated with each type of action: Emergency and Rapid Response Services (ERRS) contracts for emergency response, Superfund Technical Assessment and Response Team (START) contracts for removal activities, and Remedial Action Contracts (RAC) for remediation activities. It was not unusual for two different types of actions to be conducted

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contemporaneously at a site. Therefore, OSCs and RPMs often shared resources (i.e. contractors) and information.

EPA Region 4 utilized two RACs. RACs were multiple year awards, typically 5 years with the option for an additional 5 years. Black & Veatch had been awarded multiple RACs awards and served as a RAC contractor within EPA Region 4 for approximately 20 years. Currently, EPA Region 4 has two RAC contractors, Black & Veatch and Versar. Black & Veatch was considered a "full service" RAC and therefore received the greatest number of awards. (b) (6), (b) (7)(C), (b) (5)

Both RACs expire during the summer of 2020.

Circa 2018, EPA Region 4 began its transition from RAC to the Remedial Action Framework (RAF) as its contract award mechanism. (b) (5) Statements from personnel interviewed by OIG revealed that (b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C), (b) (5)

), (b) (7)(C) issued an "edict" instructing RPMs to cease utilization of ERRS/START contractors, as well as the Army Corps of Engineers (ACE), to perform remediation related activities. (b) (6), (b) (7)(c) instructed RPMs to terminate any active contract involving an ERRS or START contractor performing remediation, vs response activities, and re-award the task order under RAC. (b) (6), (b) (7)(C) that all task orders associated with remediation activities would be awarded to a RAC.



Statements collected during this investigation revealed that (6) (6) "edict" adversely affected at least 3 Superfund sites. These sites were identified as Post and Lumber Preserving Company Inc Superfund site, CTS of Asheville Inc. Superfund site, and Petroleum Products Corporation Superfund Site. The effects for (6) (6) "edict" were described as:

- Post and Lumber (b) (6), (b) (7)(C) selected the START contractor already conducting operations at the location to perform the site's Remedial Investigation and Feasibility Study (RI/FS). The START contractor was 6 to 8 months into performing the activity when ordered the termination of the award. ordered the termination without input from or contact with prepared a memorandum and spreadsheet of costs justifying the retention of the START contractor. These items were submitted to through through supervisor but did not decision. As a result, the START task order was terminated and a new task order was written and awarded to Black & Veatch under RAC. Once awarded the task order, Black & Veatch refused to accept the work plan implemented by the START contractor and all work at the site "started from scratch." This switch to Black & Veatch increased the costs of the project and set back remediation activities at the site approximately 1 year.
- CTS of Asheville (b) (6), (b) (7) C elected to retain the START contractor already involved at site for removal actions associated with the remediation activities.

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- reported that the START contractor was qualified to perform the tasks and identified the START contractor as a Disadvantaged Business Enterprise. When attempted to add money to START's task order for the activities, it was denied based on edict. Instead, was directed to utilize Black & Veatch for activities at the site. This action delayed the work being performed at the site.
- Petroleum Products (b) (6), (b) (7)(C) was utilizing ACE for remedial activities at the site. was informed that "management" performed a review of each Superfund site and decided to terminate the contract with ACE and re-award the task order to a RAC contractor. Once ACE reached a stopping point, their contract was terminated and re-awarded to Black & Veatch. Black & Veatch accepted the draft work plan created by ACE and worked with ACE in in finalizing the work plan. This inclusion of Black & Veatch smoothed the transition in contractors. However, the transition to a different contractor delayed work at the site 4 to 6 months.

reasoning for issuing the "edict" as: By utilizing ERRS/START/ACE for remedial activities that should be conducted under RAC, the RPMs were "changing the process" and just "doing it the easy way." Therefore, "edict" to get Superfund realigned with the process.



activities was within the scope of that funding mechanism and that ERRS contracts were also an appropriate funding mechanism for remedial activities in certain situations.

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noted that ERRS should be limited to activities were "simple" or

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Specifically.

"blue collar" (e.g. dig and haul). If the remedial project was more complex or "engineering centric", concurred that RAC was the proper funding mechanism for the action.

Despite confirmation that START, and ERRS in certain circumstances, were appropriate mechanisms to fund remedial activities, directed RPMs to limit the funding of all remedial activities to RAC. In addition to new contract awards being considered/proposed, order directed RPMs to terminate existing/on-going START/ERRS remedial contracts and re-award task orders under RAC.

(b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C), (b) (5)
(b) (6), (b) (7)(C), (b) (5)
(b) (6), (b) (7)(C), (b) (5)

o (b) (6), (b) (7)(C), (b) (5)

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During this investigation, it was learned that retired from EPA in (b) (6), (b) (7)(C). Because no evidence of criminal wrongdoing was established, was not interviewed as part of this investigation.

DISPOSITION:

Evidence collected during this investigation found that actions, specifically "edict", directly led to contract awards being directed to Black & Veatch. Further "edict" proved inefficient and more costly to the government than other available contracting actions in several circumstances. However, statements from contracting officials upheld actions as within authority and established contracting procedures. Therefore, this investigation identified no evidence of criminal wrongdoing by

Evidence gathered during this investigation supported a finding that actions gave an appearance of a bias in favor of Black & Veatch. However, retired from federal service prior to the completion of this investigation and therefore, not subject to disciplinary action for this appearance of bias.

No further action is anticipated, and this investigation will be closed.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

61 FORSYTH STREET, SW ATLANTA, GA 30303

| CASE #: OI-AT-2020- | ADM-0045 | CROSS REFERENCE | CE #: N/A |
|--|---|--|--|
| TITLE: (b) (6), (b) (| (7)(C) GS-15, (| o) (6), (b) (7)(C) | |
| INTERVIEWEE (if ap | plicable): N/A | | |
| PREPARED BY: SA | (b) (6) | | |
| | | U M OF ACTIVITY THER | |
| COMPLAINT: On Janua complaint regarding an al The complaint alleges that incarcerated since Deceminstructs managers to "fix | legation of employed it employee (b) (6), ber of 2018 and that | e misconduct (b) (6), (, (b) (7)(C) (b) (6) | (b) (7)(C) has been |
| BACKGROUND: The Beautiful wire fraud, theft, and EPA | _ | _ | urisdiction to investigate |
| Atlanta Field Office, cond was suspended for three times for driving un was placed on probation of service. (b) (6) probation and was incarce rehabilitation program (b) | ducted interviews and alcohol related incider the influence of a for twelve months and was subsequently are rated at the (b) (6) was subs | d document reviews. (b) lents. (b) (6), (b) (7) alcohol. (b) (6), (b) (d) ordered to complete 24 trested twice for violating | (a) (b) (7)(C) (b) (C) was arrested (7)(C) (c) was arrested (7)(C) (d) hours of community ag the terms of (5)(6) |
| CASE: OI-AT-2020-ADM-0045 | INTERVI N/A | EWEE (if applicable): | |
| DATE OF ACTIVITY: | DRAFTEI | D DATE: | AGENT(S): |

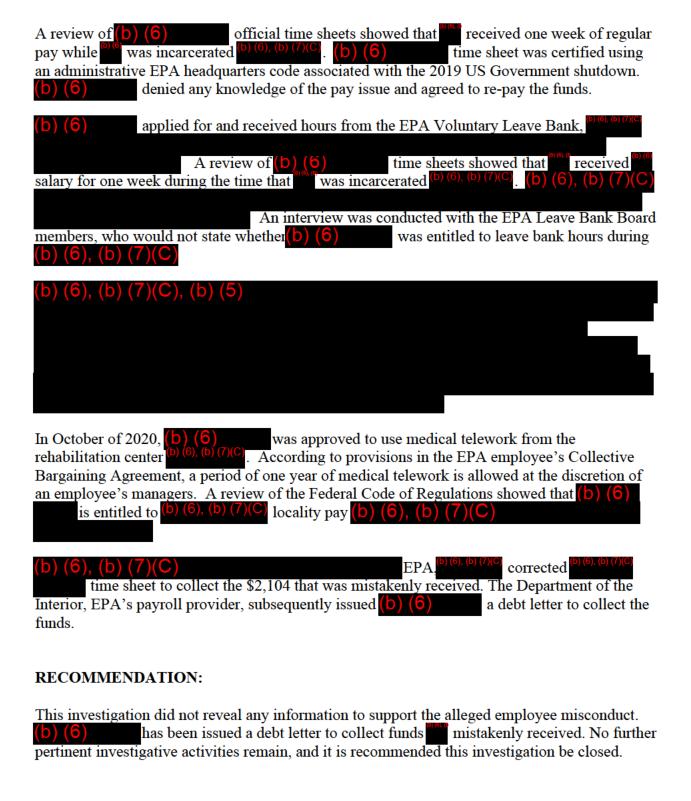
August 20, 2020

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August 20, 2020

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CASE: OI-AT-2020-ADM-0045

DATE OF ACTIVITY:

August 20, 2020

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INTERVIEWEE (if applicable):

N/A

DRAFTED DATE:

August 20, 2020

AGENT(S): SA(b)(6)

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| Δ | \mathbf{T} | $\Gamma \Lambda$ | CH | M | FN | ITS | ١. |
|---|--------------|------------------|----|---|----|-----|----|
| | | | | | | | |

None

CASE:

OI-AT-2020-ADM-0045

DATE OF ACTIVITY:

August 20, 2020

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INTERVIEWEE (if applicable):

N/A

DRAFTED DATE:

August 20, 2020

AGENT(S): SA (b) (6)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

1301 CONSTITUTION AVE, NW WASHINGTON, DC 20004

February 19, 2020

MEMORANDUM

SUBJECT: (b) (6), (b) (7)(C) GS-15, (b) (6), (b) (7)(C)

Case No. OI-CH-2019-ADM-0026

FROM: Helina Wong, Assistant Inspector General

Office of Investigations

TO: (b) (6), (

RESTRICTED INFORMATION

The Office of Investigations, EPA Office of Inspector General, conducted an administrative investigation of alleged government purchase card misuse (b) (6), (b) (7)(C)

Our investigation found (b) (6), (b) (7)(C)

ere purchase card holders, who were instructed (b) (6), (b) (7)(C) to split purchase costs for the installation of an EV Charging Station. Furthermore, our investigation revealed inconclusive information relating to the (b) (6), (b) (7)(C)

involvement.

This information is submitted for your consideration and decision as to whether administrative action is warranted. In considering administrative action, your attention is directed to the U.S. Environmental Protection Agency Conduct and Discipline Manual, EPA Order 3120.1, which prescribes policies for administering disciplinary action within the agency. The manual contains a list of offenses with suggested penalties, although the list of offenses is not intended to be all-inclusive. For offenses not listed, penalties may be imposed consistent with penalties contained in the manual for offenses of comparable gravity.

The information in the Conduct and Discipline Manual is provided to assist you in determining what action, if any, is warranted; however, it does not constitute a "charge" against the subject(s). It is the responsibility of the action official alone to evaluate the information in the report and decide whether action under any part of the Conduct and Discipline Manual is appropriate.

So that we may satisfy our reporting requirement to Congress and the Administrator, please advise this office within 60 days of the action taken or proposed by you in this matter. This report is "For Official Use Only" and its disclosure to unauthorized individuals is prohibited. The report may be used by appropriate officials for administrative action.

A copy of this transmittal letter and the report are also being sent to Wendy Blake, Associate General Counsel, Office of General Counsel. It is recommended that you confer with the Office of General Counsel to ensure that any penalty imposed is appropriate and equitable. It is also recommended that you contact the Office of Human Resources for any necessary guidance about personnel regulations.

Should you have any questions regarding the investigative report, please contact Special Agent at (b) (6), (b) (7)(C).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF THE INSPECTOR GENERAL OFFICE OF INVESTIGATIONS

77 W. JACKSON BLVD. CHICAGO, IL 60604

REPORT OF INVESTIGATION CONCERNING

(b) (6), (b) (7)(C)_{GS-15}, (b) (6), (b) (7)(C)

OI-CH-2019-ADM-0026

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Section C

Distribution:

Submitted by:

Special Agent Office of Investigations

With Exhibits

Wendy Blake U.S. Environmental Protection Agency Associate General Counsel Office of General Counsel

Assistant Special Agent in Charge Chicago Field Office Office of Investigations

Reviewed by:

2/19/2020

Helina Wong

Assistant Inspector General Office of Investigations

Contents of this report and / or its exhibits may contain personally identifiable information (PII), to include sensitive PII (SPII) protected by the Privacy Act and is subject to the EPA Policy on PII and SPII. As such, please follow the agency's policy on PII and SPII, to include ensuring that this report and exhibits are properly safeguarded.

OFFICE OF INSPECTOR GENERAL OFFICE OF INVESTIGATIONS

CASE NO.: OI-CH-2019-ADM-0026 DATE OPENED: November 27, 2018

CASE TITLE: (b) (6), (b) (7)(C) GS-15, CASE AGENT: (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

CASE CATEGORY: Employee Integrity OFFICE: Chicago

JOINT AGENCIES: None JURISDICTION: (b) (6), (b) (7)(C)

SECTION A - NARRATIVE

Introduction

On September 30, 2018, the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), Office of Investigations (OI), Chicago Field Office (CFO), (b) (6), (b) (7)(C), (b) (3) alleging government purchase card misuse

(b) (6), (b) (7)(C), (b) (3)

provided information stating that

ere purchase card holders, who
were instructed by (b) (6), (b) (7)(C)

o split purchase costs for the installation
of an EV Charging Station.

This case was opened to investigate the source used to fund the installation of the EV Charging Station, determine if split purchases were made to fund the installation of the EV Charging Station and investigate whether any employee misconduct involving the purchase cards occurred. (Exhibit 1)

Possible Administrative Violations

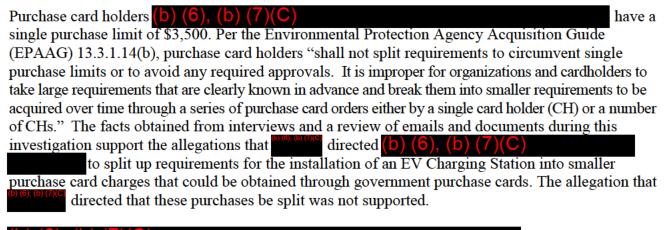
EPA Acquisition Guide (EPAAG) 13.3.1.14, Purchase Guidelines

EPA Order 3120.1, Appendix- Table of Offenses and Penalties:

(46)(a) Violation of applicable Federal (e.g. OMB, Treasury, GSA, EPA) resources management laws, rules, or regulations by an individual occupying a position where knowledge of such resources management laws, rules, or regulations is required by the position;

(46)(b) Advising or ordering a subordinate to violate applicable Federal (e.g., OMB, Treasury, GSA, EPA) resources management laws, rules, or regulations.

Synopsis



(b) (6), (b) (7)(C)

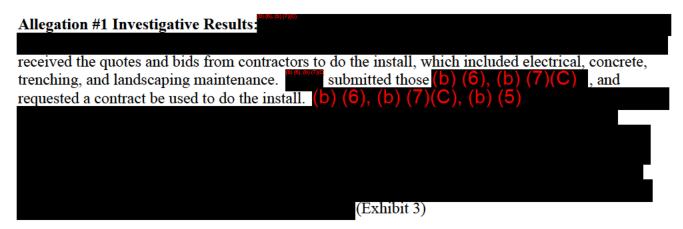
(Exhibit 2)

Details

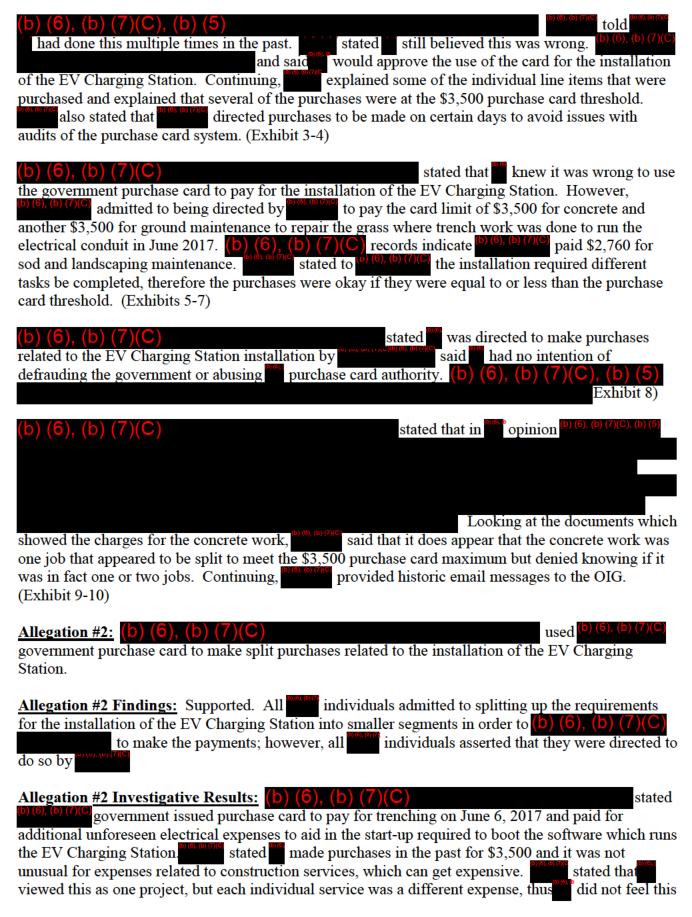
Investigation Disclosed Allegations Supported

Allegation #1: In order to get the Electronic Vehicle (EV) Charging Station installed, (b) (6), (b) (7)(C) directed and authorized split charges using government purchase cards.

Allegation #1 Findings: Supported. (b) (6), (b) (7)(C) confirmed confirmed into smaller segments so that the items could be purchased using government purchase cards.



| According to (b) | (6), (b) | (7)(C | (b) | (5) | | | | | | | |
|------------------|--------------------|-------|---------|-----------------------------------|------|---------|--------|-----|----------|------------|-------|
| | | | | | | | | | | | |
| | stated to | | | | | | | | of the p | purchase o | eard, |
| but information | med (6), (6), (7), | that | believe | $\operatorname{ed}\left(b\right)$ | (6), | (b) (7) | C), (b | (5) | | | |



```
was a violation of the cost splitting rule for purchase cards.
                                                              stated was directed by
make these purchases as part of the EV Charing Station installation project and had no intention of defrauding the government or abusing purchase card authority. (b) (6), (b) (7)(C), (b) (5)
11)
                                                          stated the budget for the installation of the
EV Charging Station was originally $25,000. (b) (6), (b) (7)(C)
                                                                                quotes and bids from
contractors to do the install, which included electrical, concrete, trenching, and landscaping
maintenance. submitted those to (b) (6), (b) (7)(C), and requested a contract be used to do
the install (b) (6), (b) (7)(C), (b) (5)
                                                                                            (Exhibit 3)
    (6), (b) (7)(C), (b) (5)
                                                  wanted to use the government purchase card to pay
for the contractors to do the install.
                                          stated to
                                                                 knew this to be wrong and a misuse of
                                               that believed the install of trenching, pouring
the purchase card, but
                        informed informed
concrete, installing electrical, etc. to be each an individual purchase, or phase, within a larger project.
                                                                 stated still believed this was
        told
                      had done this multiple times in the past.
                                                           and said would approve the use of the
card for the installation of the EV Charging Station.
                                                          also stated that
                                                                                    directed purchases
to be made on certain days to avoid issues with audits of the purchase card system. (Exhibit 3)
                                                                stated that knew it was wrong to use
the government purchase card to pay for the installation of the EV Charging Station. However,
   (6), (6), (7)(C) said that it was used to help expedite the installation process and to meet deadlines set by
management.
              admitted to paying the card limit of $3,500 to pay for concrete and another
$3,500 for ground maintenance to repair the grass where trench work was done to run the electrical
conduit in June 2017. Furthermore, (b) (6), (b) (7)(C) had documentation to show where the original bill for
the concrete work was going to be $10,500, which could not pay due to it being over the purchase
card limit. Subsequently, received a bill for \$3,\overline{500}, which is the payment card maximum.
         made the payment for the concrete, knowing this was a misuse of the payment card;
                 stated the installation required different tasks be completed, therefore the purchases
were okay if they were equal to or less than the purchase card threshold (b) (6), (b) (7)(C)
this order from regulations(b) (6), (b) (7)(C), (b) (5)
                                         did not seem correct based on the purchase card rules and
(Exhibit 5-7)
```

Investigation Disclosed Allegations Inconclusive

to authorize the use of purchase cards to expedite directed (b) (6), (b) (7)(C) the installation process. Allegation #3 Findings: Not supported. Government purchase card charges for items such as: concrete, trenching equipment rental, electrical installation, electrical materials, power installation costs, ground turf repair were authorized at the purchase card limit of \$3,500 by EV Charging Station. The investigation was inconclusive in regard to (b) (6), (b) (7)(C) authorize the use of the purchase cards. Allegation #3 Investigative Results: (b) (6), (b) the budget for the installation of the EV Charging Station was originally \$25,000. (b) (6), (b) (7)(C quotes and bids from contractors to do the install, which included electrical, concrete, trenching, and landscaping maintenance. submitted those to (b) requested a contract be used to do the install (b) (6), (b) (7)(C), (b) submitted those to (b) (6), (b) (7) (C), and did not want to use the in-house had decided contractor to expedite the install but wanted to use the government purchase card to pay for the contractors to do the install. (Exhibit 3) at the time of the EV Charging Station project (b) (6), (b) reported to (b) (6), (b) (7)(C) for their supervisor, (b) The EV Charging Station installation (b) (6 and the stations were purchased with a GSA contract. The purchase only covered the equipment, not the installation. (b) (6), (b) (7)(C), (b) (5) stated the determination to not use a government contract was made by (Exhibit 10) stated the EV Charging Stations were (b) (6), (b) (7)(C) bought by the EPA, but was unsure how exactly the stations were paid for by the EPA. said that worked for the facilities team to manage this project worked stated role was to facilitate the installation of the station once it was approved for purchase by management. delegated the actual project of the installation to one of employees, in this case it was (Exhibit 12) summarized role in the purchasing, or paying for services, as reviewing purchases to ensure they benefited the government and were appropriate for the project (b) (6), (b) When questioned thought the purchases looked suspicious or unusual, stated that no one in the chain of the purchase card(s) thought these purchases were inappropriate, or did not say anything to stop it, and the purchase card oversight committee never brought these purchases to

Allegation #3: In order to get the Electronic Vehicle (EV) Charging Station installed,

| additional emphasis for regular basis to review goals and expectation employees were able is that (b) (6), (b) (7)(C) | denied that there was any push to complete this project or that there was for this specific project. admitted that met with employees on a w their projects, but each employee was responsible for setting their own project followed up on each employee's progress and tried to ensure the to stay on track with their project goals and expectations. (b) (6), (b) (7)(C), can work independently and manage minimal oversight or guidance from (Exhibit 12) |
|---|--|
| (b) (6), (b) (7)(C |), (b) (5) denied putting additional pressure on to the contract of the contr |
| illegal or to break EP | e, to get this project completed to denied asking someone to do anything A policies at any point during career. denied asking someone to do anything denied that the purchase card g this project out for a government contract to give preferential treatment to a |
| | Disposition |
| | igation is being issued to the (b) (6), (b) (7)(C) and any administrative actions deemed appropriate. |
| | SECTION B – ENTITIES AND INDIVIDUALS |
| Name of Person: Title & Company: Role: Business Address: | (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Subject / Supervisor (b) (6), (b) (7)(C) |
| Business Phone: EPA Employee: | (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) |
| Name of Person: Title & Company: Role: Business Address: | (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Subject (b) (6), (b) (7)(C) |
| Business Phone: EPA Employee: | (b) (6), (b) (7)(C) |
| Name of Person: Title & Company: Role: Business Address: | (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Subject (b) (6), (b) (7)(C) |
| Business Phone: EPA Employee: | (b) (6), (b) (7)(C) Yes |

SECTION C - PROSECUTIVE STATUS

This was an administrative investigation. As such, it was not referred for criminal prosecution.

EXHIBITS

| DESCRIPTION | EXHIBITS |
|--|----------|
| Case Initiation [redacted] | 1 |
| (b) (6), (b) (7)(C) | 2 |
| Transcribed Interview from December 12, 2018 | 3 |
| (b) (6), (b) (7)(C) EV Charing Station Miscellaneous Purchases | 4 |
| (b) (6), (b) (7)(C) Split Concrete Purchase | 5 |
| (b) (6), (b) (7)(C) Purchase for Landscaping/ Sod Repair | 6 |
| (b) (6), (b) (7)(C) Transcribed Interview from December 12, 2018 | 7 |
| Transcribed Interview from December 12, 2018 | 8 |
| (b) (6), (b) (7)(C) provided E-Mails | 9 |
| (b) (b) (7)(C) Transcribed Interview from December 12, 2018 | 10 |
| (b) (6), (b) (7)(C) Purchase of Electrical Supplies | 11 |
| (b) (6), (b) (7)(C) Transcribed Interview from December 12, 2018 | 12 |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

DATE: SEPTEMBER 22, 2020 **PREPARED BY:** SA (b) (6), (b) (7)(C)

CASE #: OI-HQ-2019-ADM-0088 **CROSS REFERENCE #:**

TITLE: (b) (6), (b) (7)(C) SES, (b) (6), (b) (7)(C)

CASE CLOSING REPORT

| Subject(s) | Location | Other Data | |
|--|----------------|------------|--|
| (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) | WASHINGTON, DC | N/A | |

VIOLATIONS/ALEGATIONS:

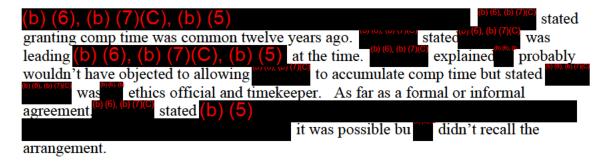
- 1. Willfully using or authorizing the use of a government passenger motor vehicle or aircraft for other than official purposes. [31 U.S.C. 1344]
- 2. Using Government property or Government employees in duty status for other than official purposes
- Misuse of an Official Government Vehicle, transporting a family member in an OGV

FINDINGS:

contacted (b) (6), (b) (1)(C) Special Agent in Charge (SAC), Office of Professional Responsibility (OPR), Office of Investigations (OI), Office of Inspector General (OIG), EPA and alleged (b) may have: 1. On or about 2006, permitted (b) (6), (b) (7)(C) to keep an off the record compensatory time leave bank for and permitted consistently report in PeoplePlus was working regular hours when, in fact, was taking leave computed from the off the record comp time schedule. FINDING: stated during interview didn't recall a formal agreement to to keep "off the books" compensatory (comp) time.

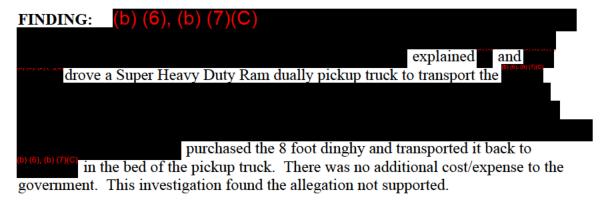
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An examination of EPA order 3155, Pay Administration dated 10/12/1991 provided some guidelines for time and attendance. There were no prohibitions of keeping "off the books" compensatory time. The allegation is twelve years old. (b) (6), (b) (7)(C) was the timekeeper (b) (6), (b) (7)(C) . In interview, interview, interview, interview stated administrative management rules were tightened by the agency and the practice was terminated. This investigation found the allegation not supported.

2. Misused government resources by directing an EPA employee to use an EPA truck to transport (b) (6), (b) (7)(C) boat from (b) (6), (b) (7)(C).



3. Misused an EPA government vehicle by transporting family, to include family dog, from (b) (6), (b) (7)(C)

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used the GOV when wanted to take dog.

half a dozen times and on one or two occasions, when wanted to take dog.

was shown a ticket for a vehicle noted the vehicle had to be cleaned because of "dog hair."

transported dog on the trip to/from DC.

stated tried to vacuum the back seat but was unsuccessful at removing the dog hair.
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RESTRICTED INFORMATION

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| | num suspension found in 31 USC 1349(b) requires "willful" |
|---------------------------------|--|
| | here's no evidence that knew knew could not have |
| in the car. (b) (6), (b) (7)(c) | stated it was brought to attention transporting (b)(6),(b)(7)(5) |
| may be outside of policy. | stated upon being advised, discontinued the use of |
| the GOV to commute. (b)(b), (b) | stated traveling by GOV to/from DC was the least |
| expensive mode of travel. T | his investigation found the allegation was not supported. |

DISPOSITION:

All of the allegations in this investigation are not supported. This investigation is closed.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

1301 CONSTITUTION AVE., NW WASHINGTON, DC 200042

DATE: May 14, 2020 **PREPARED BY:** SA (b) (6), (b) (7)(C)

CASE #: OI-HQ-2020-ADM-0017 CROSS REFERENCE #: Hotline 2019-0323

TITLE: (b) (6), (b) (7)(C) GS-15, (b) (6), (b) (7)(C)

CASE CLOSING REPORT

| Subject(s) | Location | Other Data | | |
|---------------------|----------------|------------|--|--|
| (b) (6), (b) (7)(C) | Washington, DC | N.A. | | |

VIOLATION(S):

5 U.S.C. app. 4 §§ 501-505

Outside earned income and activities

ALLEGATION:

On October 22, 2019, the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), Office of Investigations (OI), Washington Field Office, reviewed Hotline complaint 2019-0323. The complainant alleges that EPA employee (b) (6), (b) (7)(C) is engaging in ethical violations concerning involvement as a real estate agent for (b) (6), (b) (7)(C)

FINDINGS:

Open sources searches, consultation with EPA Ethics Office.

DISPOSITION: Unsupported; Closed

The investigation determined has an approved off duty employment authorization to work as a realtor from designated ethics official. According to EPA's Ethics Office, work as a realtor will not conflict with duties in government position. This case is now closed.

RESTRICTED INFORMATION

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